

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

ABDULWAHAB HUMAYUN

FILED UNDER SEAL

Case No. 1:20-mj-353

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Adam Greenspan, being first duly sworn, hereby depose and state as follows:

I. Introduction and Agent Background

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), assigned to the Washington Field Office (“WFO”). I have been employed as an FBI Special Agent since January 2016, during which time I have investigated and participated in the investigation of terrorism violations, to include extremist groups targeting United States persons, both domestically and abroad. As a Special Agent, I have received training at the FBI Academy in Quantico, Virginia, in criminal, cyber, and counterterrorism matters. As a result of my training and experience, I am familiar with the tactics, methods and techniques of terrorist networks and their members, including the use of computers, cell phones, social media, email, and the internet in connection with criminal activity.

2. This affidavit is submitted in support of a criminal complaint charging ABDULWAHAB HUMAYUN with knowingly and willfully using a trick, scheme, or device to conceal and cover up the fact of his ownership, control, and operation of Twitter Account @AmericanEmirate (Twitter UID: 114766986) (“Twitter Account 1”), in violation of 18 U.S.C.

§ 1001(a)(1), in and around Prince William County, Virginia, in the Eastern District of Virginia, from on or about October 1, 2020, through the present.

3. This affidavit is being submitted for the limited purpose of obtaining a criminal complaint and arrest warrant. As a result, it does not include each and every fact known by me or the government. The information in this affidavit is based on my personal knowledge, evidence development during the investigation, and information provided to me by others involved in this investigation, including FBI Special Agents, task force officers, and other employees of the FBI.

4. This affidavit is based upon: (a) my personal participation in this investigation; (b) my review of records and reports generated by other law enforcement agents; (c) my review of communications data recovered during the investigation; (d) information otherwise obtained by credible and reliable sources; and (e) my training and experience as a Special Agent, including concerning the use of electronic communications in criminal activity. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not set forth all of my knowledge about this investigation.

II. Facts Establishing Probable Cause

A. Background

5. ABDULWAHAB HUMAYUN (“HUMAYUN”) was born in 1998 in Alexandria, Virginia. HUMAYUN currently resides at XXXX Sunny Brook Court in Woodbridge, Virginia with his parents. HUMAYUN graduated from George Mason University (“GMU”) with a Bachelor of Science in Computer Science in May 2020.

6. On January 17, 2020, FBI WFO opened an investigation on HUMAYUN based on the determination that he owned and operated Twitter Account 1. As further explained below,

Twitter Account 1 frequently posted publicly viewable content that was violent or threatening in nature.

B. HUMAYUN's Operation of Twitter Account 1

7. Between May 2018 and the Present, Twitter Account 1 posted publicly viewable content. The content posted by Twitter Account 1 included a variety of images, “memes,” and references to geopolitical events. A portion of the content posted contains nonspecific threats to kill, images of assault weapons, references to religious extremism, references to the involuntary celibate (“incel”¹) movement, and references to violence. As explained herein, the FBI investigation determined that Twitter Account 1 is registered to and operated by HUMAYUN.

8. In or about December 2019, the FBI received subscriber information for Twitter Account 1. The records indicated that Twitter Account 1 was registered to email account [Email Address 1]@hotmail.com, telephone number (XXX) XXX-4621, and was logged into from Internet Protocol (“IP”) address 73.201.219.12 on December 11, 2019 at 23:20:26.

9. Pursuant to the information above, the FBI obtained subscriber information for the facilities associated with Twitter Account 1. In or about January 2020, records from Apple, Inc. confirmed that email account [Email Address 1]@hotmail.com and telephone number (XXX) XXX-4621 were associated with HUMAYUN's Apple iTunes account. In addition to this, the FBI obtained subscriber records for the IP address that logged into Twitter Account 1. In or about January 2020, records from Comcast Cable Communications revealed that IP address 73.201.219.12 on December 11, 2019 at 23:20:26 resolved to HUMAYUN's address, XXXX

¹ Involuntary celibates (“incels”) are members of an online subculture who define themselves as unable to find a romantic or sexual partner despite desiring one.

Sunny Brook Court, Woodbridge, VA 22192. Over the course of the investigation, the FBI confirmed that HUMAYUN continues to reside at this address.

10. As of November 12, 2020, the FBI's continued review of Twitter Account 1's publicly viewable Tweets identified a historical pattern of nonspecific threats of violence and menacing images on the account dating back until at least October 2018 and continuing until the present. Tweets of significance posted by Twitter Account 1 include, but are not limited to, the following:

11. On October 13, 2018, Twitter Account 1 posted a picture of an unidentified male with text, which appears to have been generated by the user of the account, stating: "Never fuck with someone that wants to die in battle."



12. On November 09, 2018, Twitter Account 1 posted an image of individuals on horseback carrying swords raised in the air with text stating: "YOU TALKING MAD SHIT ABOUT ISLAM...FOR AN INFIDEL IN JIHADING DISTANCE." Based on my training and

experience, “*jihad*” is an Arabic term meaning “striving” or “struggling,” and has been used by Islamic extremists to justify violence.



13. On November 09, 2018, Twitter Account 1 posted an illustration of a figure wearing a headband containing Arabic script, who is carrying an assault rifle pointed in the air.



14. On December 04, 2018, Twitter Account 1 posted an image of a person being thrown off a building with text stating: “SHUT THE FUCK UP...PEDOPHILE.”



15. On December 09, 2018, Twitter Account 1 posted a still image from a YouTube video showing an individual holding an assault rifle with text, which appears to have been generated by the user of the account, stating: “Let these kuffar niggas know that Prophet Muhammad (PBUH) still has shooters out here.” Based on my training and experience, “*kuffar*” is an Arabic term meaning “nonbeliever” or “infidel,” which has been used by Islamic extremists to justify violence against individuals who reject or disbelieve in God and/or the tenets of Islam.



16. On February 10, 2019, Twitter Account 1 posted an image of a dog pointing a pistol toward the camera with text stating: “HEY MAN THAT’S HARAM...FUCK YOU FOR POSTING THAT.” Based on my training and experience, “*haram*” is an Arabic term meaning “forbidden,” which has also been used by Islamic extremists to justify punishment or violence against individuals who are determined to have engaged in acts forbidden under Islamic law.



17. On April 21, 2019, Twitter Account 1 posted an image of the Star Wars character Yoda with text stating: “DO JIHAD, I MUST...KILL INFIDELS, I WILL.”



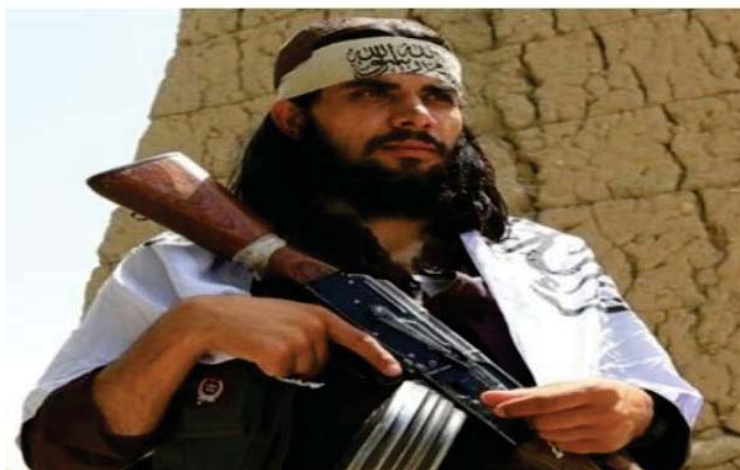
18. On August 05, 2019, Twitter Account 1 posted an image of a group of males walking on the street with text stating: “WE ARE GOING...TO BEAT YOU TO DEATH.” Based on my training and experience, the man in the middle is Anjem Choudary, a British extremist who was arrested and spent time in prison for recruiting on behalf of the Islamic State of Iraq and Syria (“ISIS”).



19. On September 13, 2019, Twitter Account 1 posted an image that included text stating: “Anti-gunner: The 2nd amendment won’t help you. As if civilians could take on the U.S. military anyway.” Immediately below, there is text stating: “Me:” and a picture of a fighter who is wielding an assault rifle and donning a headband and flag that both contain Arabic text.

Anti-gunner: The 2nd amendment
won't help you. As if civilians could
take on the U.S. military anyway.

Me:



20. On December 17, 2019, Twitter Account 1 posted an image of a masked male pointing a rifle at the camera with text stating: “SORRY BROTHER...YOU POSTED HARAM.”



C. HUMAYUN’s Acquisition of a Semi-Automatic Weapon & Accessories

21. On or about March 1, 2019, HUMAYUN purchased an Arsenal SLR-106F semi-automatic assault rifle from an online firearms retailer, and subsequently picked up the rifle from a tactical store in Northern Virginia on March 7, 2019. In addition to purchasing the semi-automatic assault rifle, between May 2019 and September 2019, HUMAYUN conducted several transactions for firearm accessories from online retailers, some of which were for parts compatible with an Arsenal SLR-106F.

22. On January 14, 2020, HUMAYUN visited a shooting range in Northern Virginia and attempted to use the range. During an interview with FBI Agents, an employee of the

shooting range recalled that during her interaction with HUMAYUN, HUMAYUN stated that he had never fired a gun, and that he had never visited the range before. Based on his lack of experience with weapons safety and shooting range protocols, HUMAYUN was not permitted to use the range.

D. HUMAYUN's Application for Employment with the FBI

23. On September 29, 2019, of his own accord, HUMAYUN submitted an application for employment with the FBI. Specifically, HUMAYUN applied for a Technical Position under the 2020 FBI Collegiate Hiring Initiative, a program geared toward recruiting college juniors and seniors for employment with the FBI. In support of his application, HUMAYUN completed an online application and attached his cover letter, resume, and transcript from GMU. During the submission of his application, HUMAYUN affirmed that he was "willing to undergo a comprehensive background investigation..."

24. Pursuant to his employment application, on February 12, 2020, an FBI Special Agent contacted HUMAYUN via email to schedule a telephone interview. Later, on February 12, 2020, HUMAYUN responded to that email and stated that he was available for a telephone interview. On February 13, 2020, an FBI Special Agent acknowledged receipt of HUMAYUN's response, and indicated that HUMAYUN's telephone interview was scheduled for February 26, 2020 at 10:00am ET.

25. On February 26, 2020, HUMAYUN participated in a telephone interview with personnel from the FBI WFO. The interview was ostensibly based on his submission of an application for employment with the FBI. The interview consisted of FBI WFO personnel asking HUMAYUN a series of questions related to his skills and abilities, and HUMAYUN providing a

response to each question. After the interview, HUMAYUN sent an email to the interviewing personnel, thanking them for the opportunity to speak with them.

26. On September 11, 2020, an FBI Special Agent sent HUMAYUN an email to invite HUMAYUN to attend a Pre-Employment Processing session at the FBI Northern Virginia Resident Agency (“NVRA”) in Manassas, Virginia, on October 1, 2020. On September 12, 2020, HUMAYUN responded via email and accepted the invitation to participate in the session.

E. HUMAYUN’s Interview with the FBI on October 1, 2020

27. On October 1, 2020, HUMAYUN was interviewed at the NVRA by two FBI Special Agents. The entire interview—which was ostensibly conducted as a Pre-Employment Processing session related to HUMAYUN’s application for employment with the FBI—was surreptitiously audio and video recorded. Prior to the commencement of the formal interview, HUMAYUN reviewed and signed an “Applicant Acknowledgement Form,” which included the following certifications:

- a. I certify that my decision to participate in this process is completely voluntary. I understand that I am not required to participate in the Pre-Employment Processing Session, and acknowledge that I may withdraw from the process and/or leave the facility at any time.
- b. I am willing to undergo a comprehensive background investigation which includes, but is not limited to: (1) interviews of all references, spouse, former spouse, cohabitants, employment references, employers, coworkers, close personal associates, and neighborhood contacts; and (2) records checks which include credit and financial history, driving records, education, public records,

selective service registration, military records, citizenship, criminal history, and fingerprints.

- c. The statements I provide today, both orally and in writing, are true, complete, and correct to the best of my knowledge and belief and are made in good faith. I understand that a knowing and willful false statement, either orally or in writing, can be punished by fine or imprisonment or both (18 U.S.C. 1001). I understand that the information I provide, both orally and in writing, may be disclosed to the appropriate federal, state, or local authority responsible for investigating, enforcing, or prosecuting a statute, rule, or regulation if there is an indication of a violation or potential violation of a civil or criminal law or regulation. I understand that intentionally withholding, misrepresenting, or falsifying information will have a negative effect on my employment prospects, job status, ability to obtain a security clearance up to and including denial or revocation of my security clearance, or my removal and debarment from Federal service.

28. During the second phase of the Interview, interviewing agents asked HUMAYUN questions about his background and personal information consistent with the sorts of questions that would be asked as part of a routine public trust background investigation, including prior addresses, work history, and the names and contact information of people who could confirm the responses. HUMAYUN provided responses orally. As part of the interview, HUMAYUN was asked questions about his social media use, and HUMAYUN identified a number of his social media accounts across various platforms and apps. When asked about any Twitter accounts, however, HUMAYUN confirmed that while he had a Twitter account, he wasn't sure if he could remember the username. When asked about the handle, HUMAYUN responded that it

“...should be my name, um, I believe it should be my first name...it is a very old account...I am not sure about the at [@] handle...” When subsequently asked by one of the interviewing agents to clarify if his Twitter handle was “@abdulwahab,” HUMAYUN said it was. Despite claiming that he wasn’t sure he remembered the handle of the account, HUMAYUN told agents that he had logged into his Twitter account the day before the interview [September 30, 2020] to “make sure no one had gotten into it.”

29. Later in the interview, when Interviewing Agents encouraged HUMAYUN to consider all the information he had provided during the interview and reminded HUMAYUN that the “intentional omission or false information on any of the forms may be ground for discontinuance,” HUMAYUN asked to re-visit the social media section of the interview. HUMAYUN then stated that his Twitter Account handle/username was “@mrdangeroush.”

30. According to Twitter’s records, from the time of the creation of Twitter Account 1 in 2010 through in or about April 2018, the account handle was @mrdangeroush. Between April 2018 and October 1, 2020, HUMAYUN changed Twitter Account 1’s handle multiple times, finally settling on its current name, @AmericanEmirate. Twitter Account 1 has never had the vanity name @abdulwahab. Twitter Account 1, like all Twitter accounts, cannot be searched for by its prior account handles. However, historical Tweets by other Twitter users that tagged Twitter Account 1 while it had the handle @mrdangeroush may still display the @mrdangeroush handle with a link to Twitter Account 1 in its current name. In October 2020, Twitter Account 1 prominently displayed the handle @AmericanEmirate.

31. During the interview, Interviewing Agents encouraged HUMAYUN to contact the FBI if he needed to clarify information provided during the interview, or if he remembered any additional details.

32. On October 5, 2020, HUMAYUN sent an email to thank FBI personnel for the opportunity to be a part of the pre-employment processing session. In his email message, HUMAYUN did not provide any supplemental information related to his social media activities, nor did he attempt to clarify any of the answers he provided related to his presence on social media during the October 1, 2020 interview.

F. HUMAYUN's Activities After the FBI Interview

33. After his interview at the NVRA on October 1, 2020, FBI surveillance determined that HUMAYUN returned to his residence at approximately 3:21pm ET. His return was video recorded.

34. According to Twitter records, on October 1, 2020, at approximately 4:59 pm ET, the user of Twitter Account 1 (*i.e.*, the account whose prior vanity name was @mrdangeroush and whose current vanity name was @AmericanEmirate) modified the account's privacy settings to "protect" account content. Based on open source information, when a Twitter user enables the "protect tweets" setting, Tweets and other account information are only visible to people who are "Followers" of the subject account, and are no longer publicly visible. This action occurred less than two hours after HUMAYUN returned to his residence immediately after the FBI interview on October 1, 2020.

35. On October 2, 2020, at approximately 10:37 am ET, while Twitter Account 1 was set to private, a user created a new Twitter account (hereinafter "Twitter Account 2") with Twitter UID: 1312039077672353794. On the date of its creation, it displayed the handle @mrdangeroush. As described above, @mrdangeroush was the Twitter account handle HUMAYUN provided to Interviewing Agents during his October 1, 2020 interview with the FBI.

36. According to Twitter records, the email address associated with the creation of Twitter Account 2 was [Email Address 2]@gmail.com. HUMAYUN listed the email address [Email Address 2]@gmail.com as one of his email addresses on the Pre-Employment Processing session Part I Form during the FBI interview on October 1, 2020. Additionally, Twitter records indicate that the IP address associated with the creation of Twitter Account 2 was 73.201.219.12, the same IP address associated with logins from Twitter Account 1 throughout early October 2020.

37. On the date of its creation, the profile of Twitter Account 2 described the account as a “Placeholder for a Twitter Bot² that utilizes Twitter API³.” In describing the account in these terms, the FBI assesses that HUMAYUN was attempting to create a decoy Twitter account that would appear to serve the purpose of highlighting his computer science and computer programming skills in support of his application for employment with the FBI. The Twitter account appeared as follows:

² According to open source information, a Twitter Bot is a type of bot software—*i.e.*, a software application that performs automated tasks over the internet—that controls a Twitter account via the Twitter programming interface. The bot software may autonomously perform actions such as tweeting, re-tweeting, liking, following, unfollowing, or direct messaging other accounts.

³ An Application Programming Interface (“API”) is defined as a set of functions and procedures that allows for the creation of applications that access the features or data of an operating system, application, or other service.



38. Records provided by Twitter indicated that the user of Twitter Account 1 modified the account's privacy settings to "unprotect" the account content on October 2, 2020, at approximately 10:54 am ET (*i.e.*, approximately 17 minutes after Twitter Account 2 was created). When a Twitter user disables the "protect tweets" setting, Tweets and other account information are visible to the general public.

39. Records provided by Twitter revealed that between October 1, 2020, and October 8, 2020, both Twitter Account 1 and Twitter Account 2 had contemporaneous login activity from IP address 73.201.219.12, as follows:

Twitter Account 1		Twitter Account 2	
IP Address	Date/Time	IP Address	Date/Time
73.201.219.12	2020-10-01 21:09:30.000Z	73.201.219.12	2020-10-02 14:37:55.711Z
73.201.219.12	2020-10-02 14:58:29.000Z	73.201.219.12	2020-10-02 14:51:58.000Z
73.201.219.12	2020-10-02 19:40:24.000Z	73.201.219.12	2020-10-02 14:53:19.000Z
73.201.219.12	2020-10-03 22:53:03.000Z	73.201.219.12	2020-10-03 05:18:02.000Z
73.201.219.12	2020-10-04 23:10:05.000Z	73.201.219.12	2020-10-04 23:50:46.000Z
73.201.219.12	2020-10-05 04:13:56.000Z	73.201.219.12	2020-10-05 23:34:59.000Z
73.201.219.12	2020-10-05 23:51:01.000Z	73.201.219.12	2020-10-06 10:41:46.000Z
73.201.219.12	2020-10-06 10:29:41.000Z	73.201.219.12	2020-10-06 23:03:35.000Z
73.201.219.12	2020-10-06 22:40:42.000Z	73.201.219.12	2020-10-07 12:22:01.000Z
73.201.219.12	2020-10-07 23:00:59.000Z	73.201.219.12	2020-10-07 23:11:00.000Z
73.201.219.12	2020-10-08 23:27:37.000Z	73.201.219.12	2020-10-08 23:00:01.000Z

40. Records provided by Comcast Cable Communications confirmed that all activity associated with IP address 73.201.219.12 detailed in the chart above, which includes logins from both Twitter Account 1 and Twitter Account 2, resolves to a Comcast high speed internet service account in the name of HUMAYUN's immediate family member, with a service address of XXXX Sunny Brook Ct., Woodbridge, Virginia, HUMAYUN's home address.

41. As of December 11, 2020, Twitter Account 1 and Twitter Account 2 both remain open, active, and publicly viewable.

42. Based on the foregoing, I submit that there is probable cause to believe that HUMAYUN—after participating in the FBI interview on October 1, 2020 and falsely stating that his Twitter handle was @mrdangeroush—temporarily made Twitter Account 1 private and created Twitter Account 2, as part of a trick, scheme, or device to conceal and cover up his ownership, control, and operation of Twitter Account 1.

III. Conclusion

43. Based on the forgoing, there is probable cause to believe that, in and around about October 1, 2020, and continuing through the present, in Prince William County, Virginia, in the Eastern District of Virginia, ABDULWAHAB HUMAYUN knowingly and willfully falsified, concealed, and covered up by a trick, scheme, or device a material fact in a matter within the jurisdiction of the Executive Branch of the Government of the United States, in violation of 18 U.S.C. § 1001(a)(1).

44. Wherefore, I request that the Court issue an arrest warrant pursuant to the Federal Rules of Criminal Procedure.

Respectfully submitted,

Adam Greenspan Digitally signed by Adam Greenspan
Date: 2020.12.14 10:01:34 -05'00'

Adam Greenspan
Special Agent
Federal Bureau of Investigation

Subscribed to and sworn to in accordance with Fed. R. Crim. P. 4.1
by telephone on December 14, 2020.

**John F.
Anderson** Digitally signed by John
F. Anderson
Date: 2020.12.14
11:27:57 -05'00'

HON. JOHN F. ANDERSON
UNITED STATES MAGISTRATE JUDGE
Alexandria, Virginia